



State of Ohio Environmental Protection Agency

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April 7, 1997



Mr. Paul R. Steadman, OSC
USEPA Region V, SE-5J
Emergency and Enforcement Response Branch
Superfund Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: GH&R Foundry Site Draft Removal Action Work Plan

Dear Mr. Steadman:

In response to your letter of March 24, 1997 requesting comments by April 9, 1997 for the GH&R Foundry Site Draft Removal Action Work Plan, I am dismayed at your comment of "...our respective agencies...partnership...protection of the environment and public health...relates to the referenced site...." This office has had no communication, written or verbal, from you or the City of Dayton for several months regarding the status of activities at this site. Your assumption that this office has had a copy of the Draft Removal Action Work Plan since March 6, and the fact that we did not receive a copy of the Plan until March 25 and your letter on March 31, only reflects your lack of communication to support our "partnership".

In the future, this office expects a better cooperative effort and communication from USEPA regarding remedial activities at the former GH&R Foundry. We will assist in any way possible and as you are already aware, we have pertinent information regarding PCB items and possible PCB contaminated areas at the site.

With little time for extensive review, and in order to meet your stipulated deadline of April 9, 1997 for receipt of comments, we have no detailed specific comments to offer. However, in general, in reference to Section 2.2.3 Transformers/Capacitors, the PCB program does support the testing for PCBs of all unknown oils and items i.e., transformers and capacitors, as well as using existing documentation from previous reports which describe known PCB items and can be used to identify existing or non-existing PCB transformers and capacitors. We also agree that 10 ppm PCBs is the appropriate cleanup level that should be attained. The outdoor area next to the existing building at Plant G where four nameplated PCB transformers and other PCB-

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director

contaminated transformers were stored, should be extensively sampled for PCB contamination.

In addition, a copy of the Draft Work Plan was provided to David Jancuk with Ohio EPA's Cessation of Regulated Operations (CRO) Program on April 7, 1997. The following are measures which must be implemented for the GH&R Foundry Site in order to comply with Chapter 3752 of the Ohio Revised Code (ORC) and rules adopted thereunder, Chapter 3745-352 of the Ohio Administrative Code (OAC).

1) ORC 3752.07(A) (C) Building, structure or outdoor location to be secured against unauthorized entry; warning signs.

This law requires that the GH&R site be secured against unauthorized entry for each building or structure at the facility where regulated operations were conducted and that contains or is contaminated with regulated substances. This includes each outdoor location of operation. At a minimum, secure the facility by the methods prescribed in rules adopted under section OAC 3745-352-20(A)


2) OAC 3745-352-20(B) Warning Signs.

At a minimum, the warning signs must state "The building, structure, or outdoor location of operation contains or is contaminated with regulated substances that may endanger public health or safety if released into the environment".

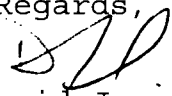
Finally, other requirements for the CRO Program as stated in the ORC 3752 must be met. These requirements include notification of cessation, documentation of removal activities, and the designation of a contact person. A packet of information explaining all CRO requirements will be sent to Roy F. Weston, Inc. in care of Brad White.

On future correspondence related to this site, please copy David Jancuk. Questions concerning CRO comments and requirements should be address to David Jancuk at (614) 728-5257. For questions regarding PCB comments, contact Tom Buchan at (614) 644-3068.

Regards,


for Tom Buchan
PCB Inspector
Div. of Emergency and
Remedial Response

Regards,


David Jancuk
CRO State Coordinator
Div. of Emergency and
Remedial Response

RJ/TB/cs

cc: Ken Schultz, Manager, CEPP, DERR
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